

October 9, 2018

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

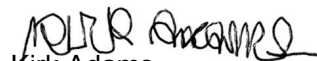
Dear Chairman Pai:

Our mission at the American Foundation for the Blind (AFB) is to create a world of no limits for people who are blind or visually impaired. We mobilize leaders, advance understanding, and champion impactful policies using research and data. In pursuing this mission, we have worked tirelessly to remove educational barriers for children with disabilities, so they can learn effectively at school and at home. With regards to serving the needs of these children, AFB has had an invaluable partner in Litton Entertainment.

Litton made the decision years ago to make serving families with special needs a priority. They were the first program provider to deliver video description for all of their weekly Educational/Informational (E/I) programming to broadcast networks. Video description provides enhanced detail of a program's visual content and is inserted during existing pauses in the show's audio track. This enhancement makes television programming more accessible to a wide range of viewers including those with learning disabilities, autism, viewers who are visually impaired, or English language learners. As a result, our special needs community has been able to experience the full value of this remarkable programming. Moreover, Litton has dedicated time and talent to producing and airing Public Service Announcements informing viewers how to access and use video description. Litton's weekly described shows not only help network-affiliated stations fulfill their FCC requirement of video-described programming per quarter, but more importantly, Litton makes high-quality E/I programs available to all viewers, including those who are blind or visually impaired.

We commend the FCC for its recent increase in required hours of video-described programming from 50 to 87.5 hours and appreciate your commitment to those with special needs. While the requirement for video description only applies to channels carrying Top-4 network programming, it requires 50 of the 87.5 hours to air prime time or children's programming. To that end, we covet "educational and informative programming" that fulfills the video description requirement. For families with special needs, E/I programming, particularly that produced by Litton, offers an educational outlet with no limitations. We ask you to continue to be mindful of children with disabilities and their families as you look to update the existing rules surrounding carriage of this programming. We encourage you to allow E/I programming to continue to air regularly and reliably on the main feed so that broadcasters can fulfill much of those obligated 50 hours of video description by offering our children and families rich, high-quality programming that provides a learning experience they truly enjoy.

Sincerely,



Kirk Adams  
President & CEO  
American Foundation for the Blind

Cc: Commissioner Michael O'Reilly, Commissioner Brendan Carr, and Commissioner Jessica Rosenworcel